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 Adobe Systems Incorporated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

Adobe Systems Incorporated,

 Plaintiff,
 v.
 Renee Norwood, et al.

 Defendants.

Case No. CV10-3564 SI

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE AND
 [PROPOSED] ORDER**

Date: December 14, 2010
Time: 2:30 p.m.
Court: Hon. Susan Illston

ALL RELATED CLAIMS

PLAINTIFF Adobe Systems Incorporated (“Adobe”), by and through its counsel of record,
 and Defendant Renee Norwood (“Norwood”), by and through her counsel of record, hereby
 stipulate and request as follows:

WHEREAS Adobe filed its complaint on or about August 13, 2010;

WHEREAS Norwood was served on or about September 18, 2010;

WHEREAS Norwood, through her counsel of record, Michael L. Rodenbaugh, of
 Rodenbaugh Law, and Karen J. Bernstein, of the Law Offices of Karen J. Bernstein, admitted *pro*
hac vice, filed an Answer and Counterclaims/Third-Party Complaint on or about November 17,
 2010;

1 WHEREAS the Parties have stipulated to extend the time for Adobe and Third-Party
2 Defendant Software and Information Industry Association (“SIIA”) to file responses to the
3 Counterclaims/Third-Party Complaint;

4 WHEREAS the Parties conducted a Rule 26 conference on or about November 23, 2010;

5 WHEREAS, at that time, the Parties had not yet agreed upon an ADR selection;

6 WHEREAS Karen J. Bernstein is currently in the process of withdrawing as counsel for
7 Norwood, and current representation of Norwood remains unclear;

8 WHEREAS the Parties began preparation of the Joint CMC Statement but have not yet
9 finalized a draft nor agreed upon a selection for ADR due to the ambiguity of Norwood’s
10 representation;

11 WHEREAS briefly continuing the Case Management Conference and all corresponding
12 deadlines will provide the Parties with additional time to more fully brief the Court on Adobe and
13 SIIA’s positions on the Counterclaims as well as allow time for Norwood’s counsel of record to
14 withdraw and/or substitute representation; and

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1 NOW, THEREFORE, Adobe respectfully requests the Court continue the Joint Case
2 to 18
Management Conference for approximately sixty (60) days, ~~or not earlier than~~ February 15, 2011.

3 IT IS SO STIPULATED.
4

5 DATED: December 7, 2010

J. Andrew Coombs, A Professional Corp.

6 By: /s Nicole L. Drey
7 J. Andrew Coombs
8 Nicole L. Drey
Attorneys for Plaintiff Adobe Systems Incorporated

9 DATED: December 7, 2010

Law Offices of Karen J. Bernstein

11 By: /s Karen J. Bernstein
12 Karen J. Bernstein
Attorneys for Defendant Renee Norwood

13
14
15 **[PROPOSED] ORDER**

16 PURSUANT TO REQUEST, IT IS SO ORDERED.

17 DATED: _____, 2010

18 

19 _____
20 Susan Illston
UNITED STATES DISTRICT JUDGE